

6. Defendant Juan Reyes's parents.
7. The defendants visited London in or about the year 2000 in order to visit family.
8. The defendants never visited Switzerland.
9. The defendants have no recollection of ever having spoken with any such persons; rather, to the best of the defendants' recollection, such communications were through ordinary letter correspondence.
10. The only account that is responsive to this interrogatory is the account at issue in this lawsuit, and the information requested is set forth in the accompanying document production.
11. This information was voluntarily disclosed to the IRS by defendants' counsel Doug Allen of the Seyfarth law firm. The defendants do not possess details of such voluntary disclosure.
12. Defendants are not in possession of credit cards, and the only information available to the defendants that is responsive to this interrogatory is set forth in the accompanying document production.
13. Defendants themselves.

Doug Allen of the Seyfarth Shaw law firm. See <https://www.seyfarth.com/search.html?q=allan>

Juan Reyes, III of the Faeger Drinker law firm. See <https://www.faegredrinker.com/en/professionals?lastname=reyes>

Sidney Yoskowitz, CPA, retired and current address unknown.

Dated: New York, New York
June 29, 2022

MAZZOLA LINDSTROM, LLP

/s/ Richard E. Lerner

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To: (Via Email)
AUSA Philip L. Bednar
AUSA Julia M. Glen

CERTIFICATE OF SERVICE

I certify that on June 29, 2022, I caused a copy of the foregoing document to be delivered by electronic mail (where indicated below) to counsel for plaintiff United States:

Philip.L.Bednar@usdoj.gov
Julia.M.Glen@usdoj.gov

Dated: New York, New York
June 29, 2022

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